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**BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

ORIGINAL
DEPARTMENT OF TRANSPORTATION
99 FEB 10 PM 4: 01
DOCKET SECTION

Application of)
)
 American Airlines, Inc.)
)
 under 49 U.S.C. § 40109 for an)
 exemption and frequency allocation)
 (Chicago-Moscow))

Docket OST-98-4328 - 9

Application of)
)
 Continental Airlines, Inc.)
)
 for an exemption and frequency allocation)
 (U.S.-Russia code-sharing))

Docket OST-99-5049 - 4

**CONSOLIDATED ANSWER
OF DELTA AIR LINES, INC.**

Communications with respect to this document should be sent to:

D. Scott Yohe
Senior Vice President –
Government Affairs
DELTA AIR LINES, INC.
1275 K Street, N.W.
Washington, D . C . 20005
(202) 2 16-0700

Robert E. Cohn
Katherine M. Aldrich
SHAW PITTMAN POTTS &
TROWBRIDGE
2300 N Street, N.W.
Washington, D . C . 20037
(202) 663-8060

John Varley
Assistant General Counsel
Alexander Van der Bellen
Attorney
DELTA AIR LINES, INC.
Law Department #986
1030 Delta Boulevard
Atlanta, Georgia 30320
(404) 715-5408

Counsel for
DELTA AIR LINES, INC.

DATED: February 10, 1999

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**
February 10, 1999

Application of)	
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for an exemption and frequency allocation) (U.S.-Russia code-sharing))	

**CONSOLIDATED ANSWER
OF DELTA AIR LINES, INC.**

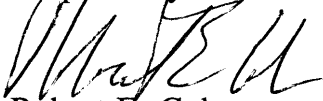
Delta Air Lines, Inc. ("Delta") hereby files this Consolidated Answer in opposition to the above-referenced applications of Continental Airlines, Inc. ("Continental") and American Air Lines, Inc. ("American").

It is Delta's understanding that the Department will shortly issue a Notice inviting interested carriers to file applications for U. S. -Russia third-country code-share opportunities as a result of the Memorandum of Consultation signed on January 22, 1999 by the Governments of the United States and Russia. Delta intends to file an application for U. S. -Russia third-country code-share service and detailed responses to the applications of other carriers in accordance with the procedural schedule established in the Department's Notice.

Delta currently operates third-country code-share service to Russia, and, as the Department is well aware, Delta has been seeking to expand its third-country code-share offerings to Russia. Those expansion efforts have been blocked, until recently, by the Federal Aviation Authority of Russia's refusal to authorize additional third-country code-share operations. Delta's existing and planned future services that will be announced in accordance with the Department's scheduling notice for the new U.S.-Russia third-country code-share opportunities are entitled to contemporaneous consideration with other applications. See, Ashbacker Radio Corp. v. FCC, 326 U.S. 327 (1945).

Delta will demonstrate that its U. S . -Russia third-country code-share service proposal will maximize service and competitive benefits and should be granted in favor of other carrier applications. Accordingly, Delta opposes the applications of Continental and American to the extent that an award to either or both carriers would foreclose the full grant of Delta's application.

Respectfully submitted,



Robert E. Cohn

Katherine M. Aldrich

**SHAW, PITTMAN, POTTS &
TROWBRIDGE**

2300 N Street, N.W.

Washington, D.C. 20037-1 128

(202) 663-8060

Counsel for Delta Air Lines, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of February, 1999, a copy of the foregoing Answer of Delta Air Lines, Inc., was served by facsimile or first class mail, on each of the following persons:

Roger Fones
Antitrust Division
Department of Justice
325 7th Street, N.W.
Suite 500
Washington, D.C. 20530

USTRANSCOM/TCJ5-AA
Attn: Air Mobility Analysis
508 Scott Drive
Scott AFB, IL 62225-5357

Director of Flight Standards
Federal Aviation Administration
800 Independence Avenue, S . W .
Washington, D.C. 20591

Jeffrey P. Fegan
Executive Director
Dallas/Ft . Worth Int'l. Airport
P.O. Drawer 619428
Airport Administrative Offices
3200 E Airfield Drive
Dallas/Ft. Worth Airport, TX 75261

Richard Vacar III
Director, Department of Aviation
City of Houston
16930 John F. Kennedy Boulevard
Houston, TX 77032

Gary J. Dellapa, Director
Miami International Airport
P.O. Box 59-2075, AMF
Miami, FL 33159

Vincent E. Bonaventura
General Manager
Newark International Airport
Tower Road, Building 10
Newark, NJ 07114

Samuel Crane, President
Regional Business Partnership
One Newark Center
Newark, NJ 07102

Mayor Sharpe James
City of Newark
920 Broad Street
Newark, NJ 07102

Robert D. Bullock
Executive Director
Orlando International Airport
One Airport Blvd.
Orlando, FL 32827-4399

Raymond Rasenberger
Zuckert, Scoutt & Rasenberger
Suite 600
888 17th Street, N. W.
Washington, D. C. 20006

Steffanie J Lewis
The International Business Law Firm
35 11 North Thirteenth Street
Arlington, VA 22203

Robert E. Cohn
Shaw Pittman Potts & Trowbridge
2300 N Street, N.W.
Washington, D. C. 20037

Richard P. Taylor
Steptoe & Johnson
1330 Connecticut Avenue, N.W.
Washington, D. C. 20036

Nathaniel P. Breed, Jr.
Shaw Pittman Potts & Trowbridge
2300 N Street, N.W.
Washington, D. C. 20037

Ted Seamon
Hewes, Morella, Gelband &
Lamberton
1000 Potomac Street, N.W.
Washington, D. C. 20007

Marshall S. Sinick
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, N.W.
Suite 500
Washington, D . C . 20004

Carl B. Nelson, Jr.
Associate General Counsel
American Airlines, Inc.
1101 17th Street, N.W., #600
Washington, D . C . 20036

Richard J. Fahy , Jr.
Consulting Attorney
Trans World Airlines, Inc.
Suite 350
900 19th Street, N.W.
Washington, D . C . 20006

Megan Rae Poldy
Associate General Counsel
Northwest Airlines, Inc.
901 15th Street, N.W., #3 10
Washington, D. C. 20036

Bruce Rabinovitz
Jeffrey Manley
Kirkland & Ellis
655 15th Street, N.W.
Washington, D. C . 20005

R. Bruce Keiner
Crowell & Moring
100 1 Pennsylvania Avenue, N . W.
Washington, D . C . 20004

Vance Fort
Worldcorp, Inc.
13873 Park Center Road
Suite 490
Herndon, VA 22071

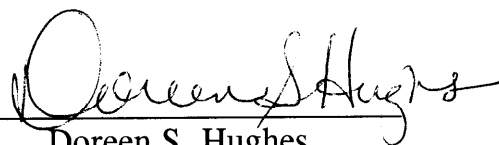
Eileen Gleimer
Boros & Garofalo, P.C.
1201 Connecticut Avenue, N.W.
Suite 700
Washington, D. C. 20036

Alfred J. Eichenlaub
Senior Vice President
Polar Air Cargo, Inc.
100 Oceangate, 1 5th Floor
Long Beach, CA 90802

David G. Bassett
President
Amerij et International, Inc.
498 S. W. 34th Street
Ft. Lauderdale, FL 33315

David L. Vaughan
Kelley Drye & Warren
1200 19th Street, N.W.
Suite 500
Washington, D . C . 20036

John L. Richardson
Seeger Potter Richardson
Luxton Joselow & Brooks
2121 K Street, N.W.
Suite 700
Washington, D.C. 20037



Doreen S. Hughes